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A corporation, other than a joint-stock corporation, may be dissolved by the death of all its members or the withdrawal of all its members, or of such a number of its members that too few remain, under the constitution of the corporation, to continue the succession and fill vacancies, *Blackwell v. State*, 36 Ark. 178; *Philips v. Wickham*, 1 Paige 590 (N. Y.) But it is not dissolved by the fact that all the shares of its capital stock have come into the hands of a single stockholder, or of a less number of stockholders than were required by the statute in the formation of the corporation. *In re Belton*, 47 La. Ann. 1614; *Louisville Banking Co. v. Eisenman*, 94 Ky. 83. Although under such circumstances, corporate action may be suspended, *Swift v. Smith*, 65 Md. 428, and a surrender of a charter by a corporation may be presumed from a neglect, for a long time, to choose corporators, *State v. Trustees of Vincennes University*, 5 Ind. 77. A corporation composed of many stock-holders may be dissolved by an individual obtaining possession of all the stock, *In re Bellona Co.*, 3 Bland 442 (Md.) This last decision was rendered in 1831, and then represented a minority rule, but the general tendency since has been to reject it and now it is doubtful if there is any minority rule on this subject. *Bridge Co. v. Traction Co.*, 196 Pa. 25; *Morawetz on Private Corporations*, 1009, 10 Cyc. 1277. It makes no difference in principle whether the sole owner of the stock of a corporation is a man or another corporation, *Exchange Bank v. Construction Co.* 97 Ga. 1-6.

CRIMINAL LAW—DEATH SENTENCE FOR LIFE CONVICT—*BROWN v. STATE*, 95 SOUTH WESTERN 1039, (TEX.)—*Held*, that although one is serving a life sentence for murder, such previous conviction does not constitute a bar to a second prosecution for murder, which may result in conviction and a death sentence may be put into effect immediately.

CRIMINAL LAW—LARCENY—STEALING GAS.—*WOODS v. PEOPLE*, 78 NORTHEASTERN, 607 (ILL.)—*Held*, that the occupant of a building who removes the meters and substitutes rubber hose connections, is guilty of grand larceny as feloniously taking the personal goods of another. The defendant's plan was to remove the meter as soon as the gas inspector had read it, and connect the pipes by means of rubber hose, this connection being left in place until near the time for the reappearance of the gas man, when it was removed and the meters replaced. It was also held in this case that in ascertaining whether the value of the gas taken was sufficient to make the offense grand larceny, the value of the gas consumed upon a number of consecutive days should be added together, and that the gas taken on each separate day did not constitute a separate offense. It was further held that in ascertaining the value, the jury should be guided by the selling price and not by the cost price of the gas.

DEAD BODIES—MUTILATION—DAMAGES—MENTAL ANGUISH.—*LONG ET AL. v. CHICAGO, R. I. & P. R. R. Co.*, 86 PAC. 289 (OKL.)—*Held*, that the parents of a deceased child are not entitled to damages for mental pain caused by the mutilation of the dead body of the child.

*Cooley*, in his work on torts, p. 280, says: ". . . the owner of the lot in which the body was deposited might maintain trespass *quare clausum* for its disinterment and recover substantial damages, in awarding which the injury to the feelings would be taken into consideration." It logically follows that a court that would allow damages for mental anguish caused by mutilation after burial would also allow the same damages for mutilation before